

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

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ANNE SMITHERS, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 1:18cv676 (TSE/IDD)
	)	
FRONTIER AIRLINES, INC.	)	
	)	
Defendant.	)	
	)	

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**JOINT MOTION FOR STAY OF PROCEEDINGS**

Plaintiffs Anne Smithers and Henry Wiley, and Defendant Frontier Airlines, Inc., by and through the undersigned counsel, hereby move this Court for an Order staying the proceedings in this matter for 30 days, pending the finalization of the terms of a settlement reached between the parties. All parties consent to the relief requested and join in this Motion, as evidenced by counsel's signature below.

The parties entered into a Settlement Agreement, the terms of which are confidential, which was fully executed by all parties as of May 30, 2019. However, certain terms need to be satisfied prior to the submission of a Stipulation of Dismissal, and while the parties are trying to expedite the performance of these terms, it is estimated that it could take up to thirty (30) days to fulfill prior to the submission of an Order of Dismissal.

Meanwhile, there are a number of deadlines that pass during this time under the terms of this Court's Scheduling Order, including the filing of dispositive motions (June 4, 2019) and the pre-trial conference with submission of trial exhibits and witnesses (June 27, 2019). Because the parties believe in good faith that the terms will be satisfied and the parties will be submitting a

Stipulation of Dismissal, the parties would like to avoid the expense associated with moving forward with the litigation during this time.

WHEREFORE, the parties respectfully request this Court to stay these proceedings for 30 days, until July 3, 2019 to allow for full and complete performance of terms contained in the Settlement Agreement by all parties and the submission of a Stipulation of Dismissal.

Respectfully submitted this 3rd day of June, 2019

/s/ ELAINE CHARLSON BREDEHOFT

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd<sup>t</sup> day of June 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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